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9 *Holdings, Inc.; Ralph de la Torre; Michael*  
10 *Callum; and Christopher Dunleavy*

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

Favorite Healthcare Staffing, LLC, a  
Kansas limited liability company,

Plaintiff,

v.

IASIS Healthcare Holdings, Inc., a  
Delaware corporation; Ralph de la Torre,  
an individual; Michael Callum, an  
individual; and Christopher Dunleavy, an  
individual,

Defendants.

Case No. 2:23-cv-01810-DJH

**SUGGESTION OF BANKRUPTCY**

(Assigned to the Honorable Diane J.  
Humetewa)

**PLEASE TAKE NOTICE** that, commencing May 6, 2024, Defendant IASIS Healthcare Holdings, Inc. in the above captioned case (along with its debtor affiliates, the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (11 U.S.C. § 101, et seq.) (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”). The Debtors’ chapter 11 cases are jointly administered under the lead case captioned Steward Health Care System LLC, et al., Case No. 24-90213 (CML). A complete list of the Debtors in the chapter 11 cases and copies of the Debtors’ chapter 11 petitions are available on the website of the

Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>.

**PLEASE TAKE FURTHER NOTICE** that pursuant to section 362(a) of the Bankruptcy Code (the "Automatic Stay"), the filing of the chapter 11 bankruptcy petitions "operates as a stay, applicable to all entities," of, among other things, "the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under [the Bankruptcy Code], or to recover a claim against the debtor that arose before the commencement of the [bankruptcy] case" and "any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate." 11 U.S.C. § 362(a)(1), (3).

**PLEASE TAKE FURTHER NOTICE** that any action against the Debtors without obtaining relief from the Automatic Stay from the Bankruptcy Court is void *ab initio* and may result in a finding of contempt for violation of the Automatic Stay. The Debtors reserve and retain their statutory rights to seek relief in the Bankruptcy Court from any action by Plaintiffs or any judgment, order, or ruling entered in violation of the Automatic Stay.

In the event the Court or any parties have questions regarding the Debtors' Chapter 11 cases or this notice, please contact bankruptcy counsel for the Debtors:

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WHEREFORE, Defendant IASIS Healthcare Holdings, Inc. respectfully suggests that this action has been stayed by operation of the Automatic Stay under 11 U.S.C. § 362(a).

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1 Dated: May 10, 2024

HUSCH BLACKWELL LLP

2  
3 By: /s/ Brendan A. Melander

4 Brendan A. Melander

5 *Attorney for Defendants IASIS Healthcare*  
6 *Holdings, Inc.; Ralph de la Torre; Michael*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 10<sup>th</sup> day of May, 2024, I electronically filed this document with the Clerk of the Court using the ECF system.

The ECF system will send notification of such filing to:

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/s/ Lisa Mocek

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Lisa Mocek